

David K. Sangster
7465 Hollister Ave. #434
Goleta, CA 93117-2537

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VIA E-MAIL

Eric Gillies, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Subject: Comments on the DRAFT ENVIRONMENTAL IMPACT REPORT for the
PRC 421 RECOMMISSIONING PROJECT

Dear Mr. Gillies:

I am not sure how well the DEIR addressed the impacts to public beach access and public safety. The public must pass through the two causeways to have lateral access to the beach at all times except at very low tides. Those causeways have been only partially upgraded – there is a lot of old rusty piers that are still holding up a lot of the existing structure, including the white I-beams that are holding up most of the wood beams under the deck. There is a real hazard to the public and there appears to be no plan to do anything – even when the rusty piers fail and metal comes down. The computer rendition of the final project is useful to see the scale of the equipment, but there should also be pictures of the existing very bad condition of half of the pier supports under the causeways.

The emergency repairs to the front of pier 421-2 were done with the public safety in mind – they did not want the public to be injured by falling debris. The front wall on 421-1 is also severely eroded at the base and may fall over at any time – one of the front corners of 421-1 fell off right after the new wall was built on 421-2. That front wall will be eventually protected by a similar structure as on 421-2, but the remaining six sides of both piers also need similar protection, and it does not seem wise to install any equipment until the entire two piers have been upgraded so they can be expected to last the projected lifetime of the project. If the equipment is installed before the structure is fully repaired, then there are the additional impacts and hazards of working around the piping and tanks. There may be significant impacts associated with any mitigation measures that are not performed before the equipment is installed, including the possible collapse of the causeway as well as the structure – either from earthquake, wave, storm, large debris and or just fatigue. The two wells should not be opened until the structures and the causeways are safe. I doubt if any seismic analysis has been done on the structures, of if they could survive the 100-year wave or a tsunami. What are the seismic risks and impacts as well as those that can be expected from the 100-year wave?

There are severe hazards and safety issues to the public if the structure is not repaired properly. Unfortunately there are even more impacts to the public and the environment

that will result from the needed repairs. When the wall on 421-2 was built there were numerous delays and setbacks as things did not go as planned. All of the heavy equipment required and pile driving to do the job also resulted in damage to the old structure – cracks developed in the old front wall and oil was leaking out into the surf before the front wall was finished. Cracks also developed on the east side of 421-2 and a foul smelly fluid has been leaking out into the surf since then. The fluid stains the old structure, and similar stains can be seen at the base of both structures when the tide is out. It is probably coming from the inside of the structure where a lot of old iron is rotting away producing hydrogen sulfide. Hydrogen sulfide plus water produces hydrochloric acid which is probably the cause of the etched stains, foul smell, and brackish sand around the structure. The interior of the structures should be core sampled so that a proper environmental evaluation of

One very important impact to wildlife may or may not been missed. The four offshore bird roosts that replaced the old “Bird Island” is the only coastal roost for the endangered brown pelican. I had suggested that the location could have been moved to the east, but it was made clear that it could not be relocated. Now it is very close to the two piers on the beach. I would guess that there should be a buffer around the roosts where any activity should be carefully monitored. Some of the night lights that were used during the repair of 421-2 were so bright that the then existing “Bird Island” was illuminated – the night lights and night time work were supposed to be at a minimum. I would also expect that any pile driving be done when the birds are not nesting.

It was also mentioned that the existing pipeline was to be reused and new pipe placed inside. It is not clear how that new pipe can be maintained and inspected to avoid leaks. If indeed there are not ways to do that, then there are impacts of having a poorly monitored pipeline so close to the beach and ocean. A buried pipeline can have small leaks that go undetected, and then during a storm, the oil could be washed into the sea.

Sincerely,

David K. Sangster

Phone (805) 9680058, e-mail daksangstr@juno.com